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FOUNDED 1866

July 13, 2011

BY ECF

Honorable Arthur D. Spatt
United States District Court
Eastern District of New York
100 Federal Plaza
P.O. Box 9014
Central Islip, New York 11722

Re: Ted Doukas, et al. v. Claudio Ballard, et al., Civ. No. 11-3275

Dear Judge Spatt:

We represent defendant Bank of Tokyo-Mitsubishi UFJ, Ltd. ("Bank of Tokyo") in the above-referenced action. Prior to the removal of the action by another defendant on or about July 7, 2011, plaintiffs had extended by stipulation Bank of Tokyo's time to answer, move or otherwise respond to the Complaint through and including August 14, 2011.

In light of the removal to this Court, and in an abundance of caution, we have executed another stipulation with plaintiffs extending the time of defendant Bank of Tokyo to answer, move or otherwise respond to the Complaint through and including August 14, 2011. We respectfully request that the Court "So Order" the enclosed stipulation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ben R. Nagin".

Benjamin R. Nagin

BRN:mm

Enclosure

cc: All Counsel of Record

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

TED DOUKAS, SYNGEN DATA SERVICES CORPORATION, TED DOUKAS as a shareholder of SYNGEN DATA SERVICES, TED DOUKAS, as a joint venture partner with CLAUDIO BALLARD, TED DOUKAS as an equitable owner of all patents and technology owned by CLAUDIO BALLARD or his purported assignees, TED DOUKAS as an equitable owner of all patents and technology owned by DataTreasury Corp., TED DOUKAS as owner of certain technology and assets produced by a joint venture with CLAUDIO BALLARD, TED DOUKAS as a 50% equitable owner of DataTreasury Corp., an assignee of CLAUDIO BALLARD'S ownership of certain technology developed by the joint venture and unknown Defendants named John and Jane Does "1" through "750", TED DOUKAS as the constructive and beneficial owner of all settlements and licensing agreements relating to certain technology created by virtue of a joint TED DOUKAS as a joint venture owner of the assets of a joint venture partnership commonly referred to "the *Doukas/Ballard joint venture*",

Plaintiffs,

- against -

CLAUDIO BALLARD, KEITH DELUCIA a/k/a "KEITH WICKEY", a/k/a "KEITH DOYLE", SHEPHARD LANE, UNIDENTIFIED DEFENDANTS JOHN AND JANE DOES "1" THROUGH "750" UNIDENTIFIED CORPORATE ENTITIES "1" THROUGH "75", UNKNOWN LICENSES AND BANKING INSTITUTIONS "1" THROUGH "75", DATATREASURY CORP., KEITH DELUCIA a/k/a "KEITH WICKEY", a/k/a "KEITH DOYLE" as an owner of shares in DataTreasury Corporation, SHEPHARD LANE, as an owner of shares in DataTreasury Corporation, CLAUDIO BALLARD, as an owner of shares in DataTreasury Corporation, SYNGEN CORPORATION, CLAUDIO BALLARD as an owner of shares in SYNGEN CORPORATION, CLAUDIO BALLARD as the Constructive trustee of TED DOUKAS' interest in the technology created by a joint venture, PETER LUPOLI, VIRGINIA LUPOLI, CSP HOLDINGS INC.,

Civ. No. 11-3275

**STIPULATION
EXTENDING TIME
TO ANSWER**

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HAROLD NIX (individually), NIX, PATTERSON AND
 ROACH, LLP, BANK OF AMERICA, WELLS FARGO
 CITIBANK, BANK HAPOLIM, BANCORPSOUTH, INC.,
 INTUIT, INC., KEYCORP and KEYBANK NATIONAL
 ASSOC., JP MORGAN CHASE & CO., INGENICO, JP
 MORGAN CHASE BANK, M&T BANK CORP., MERRILL
 LYNCH, UNION BANK OF CALIFORNIA, PNC FINANCIAL
 SERVICES GROUP, CHARLES SCHWAB & CO., INC. and
 CHARLES SCHWAB BANK, MERRILL LYNCH, PIERCE,
 FENNER & SMITH, INC., PNC FINANCIAL SERVICES
 GROUP, THE ROYAL BANK OF SCOTLAND GROUP,
 SUNTRUST BANK, INC., WELLS FARGO & COMPANY,
 BANK OF TOKYO-MITSUBISHI UFJ, LTD., THE BANK
 OF NEW YORK MELLON CORPORATION, THE BANK
 OF NEW YORK MELLON, CITIGROUP, INC., CITIBANK,
 N.A., CITY NATIONAL BANK, COMMUNITY BANKING
 SYSTEMS, BRANCH BANKING AND TRUST
 CORPORATION, COMERICA BANK, COMERICA
 INCORPORATED, COMPASS BANCSHARES, INC.,
 COMPASS BANK, DEUTSCHE BANK, EDWARD D.
 JONES & CO., L.P., HSBC NORTH AMERICA HOLDINGS
 INC., HSBC BANK USA, N.A., FIRST TENNESSEE BANK
 NATIONAL ASSOCIATION, CULLEN/FROST BANKERS,
 INC., and THE FROST NATIONAL BANK,

Defendants.

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IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and
 Defendant Bank of Tokyo-Mitsubishi UFJ, Ltd., through their respective undersigned counsel,
 that the time within which Defendant Bank of Tokyo-Mitsubishi UFJ, Ltd. may answer, move, or

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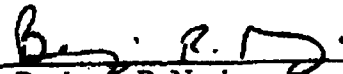
otherwise respond to the Complaint in the above-captioned action is extended through and including August 14, 2011.

Dated: New York, New York
July 12, 2011

LAW OFFICES OF ROBERT J. DEL COL

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Attorney for Plaintiffs

Attorneys for Defendant
Bank of Tokyo-Mitsubishi UFJ, Ltd.

SO ORDERED:

U.S.D.J.